

Premarket Notification for Radix Ginseng in VI-28

COMPANY NAME: Vigconic (Intenational) Ltd.
COMPANY ADDRESS: 5B, Cheong Wah Factory Building
39-41, Sheung Heung Road, Tokwawan
Kowloon, HONG KONG

NEW DIETARY INGREDIENT NAME: RADIX GINSENG (Ginseng)

INTENDED USE: Radix Ginseng is intended for use as a dietary ingredient in the dietary supplement product VI-28. The dietary supplement product will contain 75 mg of Radix Ginseng per capsule, for a dietary intake of up to maximum 150 mg per day.

HISTORY OF USE/SAFETY EVIDENCE FOR NEW DIETARY INGREDIENT:

The history of use of Radix Ginseng can be established with a brief review of products currently offered in the United States that contain this ingredient. Examples of such products include FeminiCare™ dietary supplement, Viatexx™ dietary supplement, and Betterman™ dietary supplement. With regard to Betterman™ dietary supplement, attention would like to be directed to the short term study of American men administered the dietary supplement. It was determined that there were no side effects or adverse reactions following administration of the supplement¹.

Radix Ginseng is the dried root of Panax Ginseng. Pharmacologically, Radix Ginseng has an "adaptogenic" effect, which produces an increase in the body's defenses against outside stress factors and chemicals. According to Herbal Drugs and Phytopharmaceuticals, Radix Ginseng is not a therapeutic agent, but rather an agent which regulates the resistance of the organism to various outside influences². Further, Herbal Drugs, states that side effects are "...relatively rare and only with high doses and/or use over very long periods of time"³. Side effects include sleepnesses, nervousness, diarrhea, menopausal bleeding, and hypertony. The daily dosage as indicated by the literature is 1-2 grams⁴.

Evidence of the safety of the dietary ingredient is shown in the study performed on the dietary supplement VI-28. A summary of the study and a copy are attached herewith⁵.

¹ See page 3, "Research Studies on the scientific proof that BetterMAN improves erections and prostate...III. Short-term Study with American Men...".

² Wichtl, M. "Herbal Drugs and Phytopharmaceuticals: A Handbook for Practice...", pp. 236-238.

³ Id. at pp. 237.

⁴ Id. at pp. 237, bottom, last column (boxed).

⁵ The letter from Dr. Laurence S.L. Shek and Anti-ageing Study show the results of administration of VI-28.

Based on the literature and in comparison to the intended use of Radix Ginseng in VI-28, it is believed that Radix Ginseng can reasonably be expected to be safe. Namely, literature shows Radix Ginseng administered at doses (1-2 grams daily) significantly higher than that of VI-28 (maximum 150 mg daily), with the result being no ill effects.

Premarket Notification for Cornu Cervi Pantotrichum in VI-28

COMPANY NAME: Vigconic (Intenational) Ltd.
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NEW DIETARY INGREDIENT NAME: CORNU CERVI PANTOTRICHUM
(Pilose Antler⁶)

INTENDED USE: Cornu Cervi Pantotrichum is intended for use as a dietary ingredient in the dietary supplement product VI-28. The dietary supplement product will contain 75 mg of Cornu Cervi Pantotrichum per capsule, for a dietary intake of up to maximum 150 mg per day.

HISTORY OF USE/SAFETY EVIDENCE FOR NEW DIETARY INGREDIENT:

The history of use of Cornu Cervi Pantotrichum can be established via a review of literature. In China, the red deer species is raised for their young pilose antlers⁷. According to the literature, red deer, a member of the Cervus species, has been farmed to produce velvet antler teas, extracts, capsules and tablets for health related products⁸. Currently, many countries produce velvet antler including New Zealand (450 tons/year), China (400 tons/year), Russia (80 tons/year), United States (20 tons/year), and Canada (20 tons/year)⁹. Velvet antler supplements have been the subject of numerous studies¹⁰.

Evidence of the safety of the dietary ingredient is shown in the study performed on the dietary supplement VI-28. A summary of the study and a copy are attached herewith¹¹.

In one study, Senescence-Accelerated Mice were administered subchronic oral doses of hot-water extract of pilose antler (Rokujo)¹². Doses were given orally for 8 successive days in amounts of 0, 100, or 200 mg/kg/d¹³. In a scientific review, researchers studied acute and sub-chronic toxicity of powdered deer velvet at dose levels of 2000 mg/kg for single oral treatment, and 500 mg/day orally for 90 days in rats¹⁴. It was reported that there were no

⁶ Monograph, "Cornu Cervi Pantotrichum", www.healthlink.com.au/ant_lib/htm-data/htm-herb/bhp927.htm.

⁷ "Young Pilose Antler- A Precious Crude Drug", pp. 43-45.

⁸ Batchelder, H. "Velvet Antler: A Literature Review", www.natraflex.com/studies/VA2.htm.

⁹ Id. at pp. 1.

¹⁰ Id., Antler extract was orally administered to rat and dog to determine plasma level of chondroitin sulfate (pp. 8-9), Antler extract was administered to rats to study level of monocytes (pp. 11), antler was administered to male athletes to determine effect (pp. 14).

¹¹ The letter from Dr. Laurence S.L. Shek and Anti-ageing Study show the results of administration of VI-28.

¹² Wang et al. "Effects of Repeated Administration of Deer Antler Extract on Biochemical Changes Related to Aging in Senescence-Accelerated Mice", Chem Pharm. Bull. 36, pp. 2587-2592.

¹³ Id. at pp. 2589.

¹⁴ Suttie, J. and Harris, S. "Clinical Properties of Deer Velvet",

pathological findings. Further, deer velvet powder was tested on reproduction and developmental toxicity, which was shown to have no effect on conception rates¹⁵.

Based on the literature and in comparison to the intended use of Cornu Cervi Pantotrichum in VI-28, it is believed that Cornu Cervi Pantotrichum can reasonably be expected to be safe. Namely, the literature shows Cornu Cervi Pantotrichum administered at doses (2000mg/kg and 500 mg/day for 90 days) that are significantly higher than that of VI-28 (maximum 150 mg daily), with no ill effects.

www.positivehealth.com/permit/Articles/Nutrition/sut54.htm.

¹⁵ Id.

Premarket Notification for Semen Cuscutae in VI-28

COMPANY NAME: Vigconic (Intenational) Ltd.
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NEW DIETARY INGREDIENT NAME: SEMEN CUSCUTAE (Cuscuta
Chinensis Lam.; Cuscuta japonica
Choisy)

INTENDED USE: Semen Cuscutae is intended for use as a dietary ingredient in the dietary supplement product, VI-28. The dietary supplement product will contain 60 mg of Semen Cuscutae per capsule, for a dietary intake of up to maximum 120 mg per day.

PRESENT IN FOOD SUPPLY

Semen Cuscutae has likely been present in the United States food supply, most likely in staple crops including soybean, potato, and pumpkin¹⁶. Specifically, Semen Cuscutae has been known to parasitize such staple crops. While being considered a parasite, it is a likely fact that during harvest, Semen Cuscutae was harvested along with the staple crop, and unknowingly utilized during the production of foods.

Further to its past use, Semen Cuscutae has frequently been known as a medicinal herb that is sold under a variety of names include "Dodder Seed Semen", "Cuscutae" and "Tu Si Zi"¹⁷.

HISTORY OF USE/SAFETY EVIDENCE FOR NEW DIETARY INGREDIENT:

The history of use of Semen Cuscutae can be established from a review of scientific literature. In one study, a dietary supplement, EquiguardTM, currently available in the United States, concluded that the ingredients of the dietary supplement were effective in prohibiting the effects of carcinoma¹⁸. Notably, EquiguardTM ingredients include Cuscuta Chinensis Lam. (Semen Cuscutae).

Evidence of the safety of the dietary ingredient is shown in the study performed on the dietary supplement VI-28. A summary of the study and a copy are attached herewith¹⁹.

¹⁶ NPAG DATA: Cuscuta Japonica (Japanese Dodder) 11/2001, pp. 5.

¹⁷ Id. at pp. 8.

¹⁸ Hsieh, T. et al. "Effects of herbal preparation Equiguard on hormone-responsive...", Intern. Jour. of Oncology 20: pp. 681-689 (2002).

¹⁹ The letter from Dr. Laurence S.L. Shek and Anti-ageing Study show the results of administration of VI-28.

Safety evidence for the use of Semen Cuscutae is stated in the American Herbal Products Association's Botanical Safety Handbook (BSK)²⁰. The BSK, in arranging herb ingredients, positions them in classes according to their safety. A list of the classes is attached herewith. *Cuscuta chinensis* Lam. is classified in Class 1, which refers to herbs which can be safely consumed when used appropriately.

²⁰ McGuffin, M et al. (ed.) "American Herbal Products Association's Botanical Safety Handbook".

Premarket Notification for Fructus Cnidii in VI-28

COMPANY NAME: Vigconic (Intenational) Ltd.
COMPANY ADDRESS: 5B, Cheong Wah Factory Building
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Kowloon, HONG KONG

NEW DIETARY INGREDIENT NAME: FRUCTUS CNIDII (Cnidii Monnieri
Fructus; Dried Fruits of Cnidium
monnieri)

INTENDED USE: Fructus Cnidii is intended for use as a dietary ingredient in the dietary supplement product, VI-28. The dietary supplement product will contain 60 mg of Fructus Cnidii per capsule, for a dietary intake of maximum 120 mg per day.

HISTORY OF USE/SAFETY EVIDENCE FOR NEW DIETARY INGREDIENT:

The history of use of Fructus cnidii is established from a review of current products in the U.S. marketplace. Examples of such products include Stamina-Rx, a dietary supplement for "enhancing sexual performance", which contains 25 mg of Cnidium monnieri and instructions that use should not exceed 4 tablets in a 24-hour period, for a total dietary intake of 100 mg²¹. Watkins "Male Formula" is currently being sold in the U.S. to aid in optimizing male health. The formula includes a proprietary herbal blend in an amount of 500 mg that includes Cnidium monnieri²². Vagistatin is a product useful for "cervical dysplasia, HPV, and candidiasis". The ingredients of the supplement include cnidium fruit. No information is given as to the amount used or frequency of administration²³.

Evidence of the safety of the dietary ingredient is shown in the study performed on the dietary supplement VI-28. A summary of the study and a copy are attached herewith²⁴.

Evidence of safety of Fructus cnidii is also shown in the scientific literature. In one study, the anti-inflammatory effects of a dietary supplement were determined upon application to rats. The dietary supplement, *Xuan-Ju*, contains in its ingredients Fructus cnidii. The supplement was administered at doses of .20, .40 and .80 g/kg²⁵. Another report detailed the use of Cnidium monnieri in

²¹ Available at www.stamina-rx.com/about.html.

²² Information available at www.watkinsonline.com.

²³ Information available at www.emersonecologics.com

²⁴ The letter from Dr. Laurence S.L. Shek and Anti-ageing Study show the results of administration of VI-28.

²⁵ Wei J et al. "Anti-Inflammatory effects of an herbal medicine (Xuan-Ju agent)...", Journal of Ethnopharmacology, 89(1) pp. 139-141 (2003).

the prevention of hepatotoxic effects of tacrine (1,2,3,4-tetrahydro-9-aminoacridine hydrochlorid)²⁶.

Based on the presence of *Fructus cnidii* in current herbal supplements sold on the U.S. market used in an amount similar to the amount used in VI-28 supplement, and studies performed on VI-28, it is believe that *Fructus cnidii* as present in VI-28 can reasonably be expected to be safe.

²⁶ Oh, H. "Sesquiterpenes with Hepatoprotective Activity from *Cnidium monnieri*...", *Planta Med* 68, pp. 748-749 (2002).

Premarket Notification for Kaempferiae Rhizoma in VI-28

COMPANY NAME: Vigconic (Intenational) Ltd.
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NEW DIETARY INGREDIENT NAME: KAEMPFERIAE RHIZOMA (rhizomes of
Kaempferia galanga)

INTENDED USE: Kaempferiae Rhizoma is intended for use as a dietary ingredient in the dietary supplement product VI-28. The dietary supplement product will contain 30 mg of Kaempferiae Rhizoma per capsule, for a dietary intake of maximum 60 mg per day.

HISTORY OF USE/SAFETY EVIDENCE FOR NEW DIETARY INGREDIENT:

The history of use of Kaempferiae Rhizoma is established from a review of various Asian cultures. Kaempferia galanga is cultivated in India, China, Malaysia, Indonesia, and Singapore. It is widely used as a flavoring in food, as well as a health aid. The rhizomes of Kaempferiae Rhizoma have been used to aid in abdominal pain, swelling, and rheumatism²⁷.

Evidence of the safety of the dietary ingredient is shown in the study performed on the dietary supplement VI-28. A summary of the study and a copy are attached herewith²⁸.

Evidence of safety for Kaempferiae Rhizoma is also shown in the scientific literature. In one study, the cytotoxicity effect of rhizomes of Kaempferia galangal against EBV genome carrying human lymphoblastoid cells (Raji) was performed. It was determined that Kaempferia galangal exhibited no cytotoxicity effect²⁹. In another study, the various constituents of Kaempferiae Rhizoma were determined³⁰. Safety information regarding many of the constituents can be found in the literature including cineol (which is major component of sage oil, an ingredient used in the U.S.³¹), borneol³², 3-carene (in which dairy farmers during

²⁷ Othman et al. "Vasorelaxant Effects of Ethyl Cinnamate Isolated from Kaempferia galangal...", *Planta Med.* 68, pp. 655-657 (2002).

²⁸ The letter from Dr. Laurence S.L. Shek and Anti-ageing Study show the results of administration of VI-28.

²⁹ Vimala et al. "Anti-tumor promoter activity in Malaysian ginger...", *British Journal of Cancer* 80, pp. 110-116 (1999).

³⁰ Kiuchi et al. "Studies on Crude Drugs effective on Visceral Larva..." *Chemical and Pharmaceutical Bulletin*, 36 (1) pp. 412-415 (1988). Constituents include cineol, borneol, 3-carene, camphene, kaempferol, kaempferide, cinnamaldehyde, p-methoxycinnamic acid, ethyl cinnamate, and ethyl p-methoxycinnamate.

³¹ Farhat et al. "Seasonal changes in the composition of the essential oil...", (Abstract), PubMed record no. 11478969.

³² Id.

milking are regularly exposed to the compound³³), kaempferol (in which guinea pig enterocytes were exposed to the compound in concentration of 50-450 microM, and kaempferol was determined to be less toxic³⁴), and ethyl cinnamate (EC) (in which it was determined that EC, which is present in red wines as flavor, may be responsible for the vasorelaxant activity of the rhizome of *Kaempferia galanga*³⁵).

Based on the current use of *Kaempferia Rhizoma* in cooking in many Asian cultures, studies conducted on the toxicity of the ingredient, scientific articles disclosing and researching many of the constituents of the ingredient, and the study performed on VI-28, it is believed that *Kaempferia Rhizoma* as used in the VI-28 dietary supplement can reasonably be expected to be safe.

³³ Sunesson et al. "Airborne chemical compounds...", (Abstract), PubMed record no. 11354733.

³⁴ Canada et al. "The toxicity of flavonoids..." (Abstract), PubMed record no. 2734797.

³⁵ Id. at 26.

STUDY OF VI-28¹

SUMMARY

Evidence of the safety of VI-28 is shown in the study focused on the administration of the supplement to human subjects.

12 human subjects were administered the supplement for a period of 13 months. The supplement was administered in accordance with the instructions of the manufacturer (Vigconic (International) Ltd.). The subjects were given a health evaluation and bodily fluids were analyzed between the dates 4 August 2003 to 18 August 2003. Information about the subjects is provided in the letter from Dr. Laurence S.L. Shek². The subjects were male, between the ages of 50 and 64. They exhibited a variety of lifestyles, such as smokers and non-smokers, social drinkers and daily drinkers. The subjects also possessed a variety of health conditions.

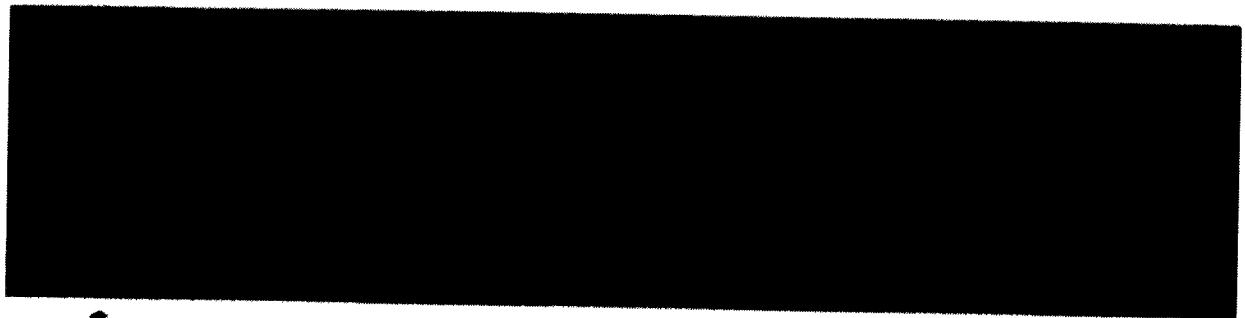
Biochemical analysis and urinalysis of the bodily fluids of the subjects was performed. The results of the urinalysis show normal conditions from the subjects following administration of VI-28 including absence of blood, bilirubin, protein (except A112), nitrites, ketones, and glucose. The results of the biochemical study compare the existing condition of the patients before administration of VI-28 and their condition following administration. According to Dr. Shek, these results are favorable.

Detailed discussion was made by Dr. Shek of subject A138, specifically the positive effect the supplement had on his chronic hepatitis. In summary, Dr. Shek concludes that based on the test results, the supplement does not have an adverse effect on the liver and/or kidney functions of VI-28 supplement users.

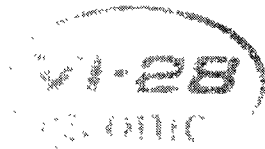
¹ VI-28 is a dietary supplement that contains the ingredients: RADIX GINSENG, CORNU CERVI PANTOTRICHUM, SEMEN CUSCUTAE, FRUCTUS CNIDII, KAEMPFERIAE RHIZOMA. The dietary supplement is recommended to be used in the following manner: 2 capsules daily for the first month, 2 capsules every 2 days for the second and third month, and twice a week, 2 capsules each time for the fourth and future months.

² Letter dated 29 August 2003. Dr. Shek is a specialist in Internal Medicine in Hong Kong SAR.

VI-28 Package Front



Pharmaceutical Research Corporation



VI-28

MADE IN U.S.A.

Pharmaceutical Research Corporation

VI-28 INCREASES THE NATURAL DEFENSE OF YOUR
NORADRENALINE
VITAMIN B12
REDUCES YOUR CHOLESTEROL
FOR FASTER HEALING

VI-28 PACKAGE BACK

Supplemental Facts

Ingredients

Include Radix Ginseng, Cornu Cervi Pantotrichum, Semen Cucurbitae, Fructus Crataegi, Rhizome Kaempferiae

Benefits

Stimulate the deteriorating pituitary gland to secrete the human growth hormone. Regulate cholesterol metabolism and balance endocrine system, strengthen immune system. Combat radicals.

Dosage

First Month: 1 time daily, 2 capsules each time

Second and Third Month: 1 time every 2 days, 2 capsules each time

Fourth Month and after: 2 times every week, 2 capsules each time to be taken in the evening

Storage

Store in cool place and keep out of reach of children

Expires

(Table 5) The data (mean \pm SD) are shown as follows

| | Before using V-28 | After using V-28 | P-value |
|-----------------|-------------------|------------------|---------|
| Age | 188 | 248** | P<0.001 |
| Height | 1.35 | 1.72* | P<0.001 |
| Weight | 308.1 | 471.4* | P<0.01 |
| Body mass index | 1.18 | 1.61* | P<0.001 |
| Cholesterol | 3.50 | 3.61* | P<0.05 |
| LDL | 17.2 | 13.6* | P<0.01 |
| HDL | 1.20 | 1.37* | P<0.01 |
| Triglyceride | 4.54 | 4.00* | P<0.01 |

*P<0.05, **P<0.01, ***P<0.001. The authors believe the immune system, LDL increase=strengthens the immune system, HDL increase=decrease of stress level, HDL increase=increase in good cholesterol.

LDL=low-density lipoprotein, HDL=high-density lipoprotein, LDL decrease=reduce cardiovascular risk.

There is a significant difference before and after use of supplement.



Vigorelle International Ltd.

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RBC-Cr-Zn-SOD is a study of antioxidant activity

CRP is a study of antioxidant activity

